

CA 89 - 7/21/89

Discussion with Louis Fantin, Lenox, (609) 896-2800 ext. 428 on Corrective Action

EPA had been compiling the HSWA permit for Lenox which we intended to issue with the NJDEP post-closure permit. The PC permit was delayed due to a determination by DEP that the proposed closure scenario was unacceptable, therefore the HSWA permit could not be issued. Lenox however, wants to begin corrective action and would like an enforceable method to do that.

I suggested that since EPA funded DEP to issue a NJPDES permit addressing corrective action (this has until now been a missed commitment) that the NJPDES permit currently being negotiated with Lenox for the containment and cleanup of the TCE plume also be the vehicle for requiring the RFI investigation and subsequent cleanup. This was agreeable to Tracy Wagner, the DEP supervisor, and I then informed Mr. Fantin of this. Once the closure issue is resolved and the PC permit drafted, the HSWA permit will include the advanced stage of corrective action reflected in the NJPDES permit. Andy P. will be involved in the initial meetings between Lenox, EPA and DEP to assure that at least all of the requirements that would have been included in the HSWA permit will be addressed in the DEP permit.

We will forward the RFA to Lenox. They will review it and then arrange a meeting with EPA and DEP.

B.T.

cc: Andy P.
Andy B.



ENVIRONMENTAL PROTECTION
AGENCY REG II

93 SEP -8 AM 10: 12

**State of New Jersey
Department of Environmental Protection and Energy**

Division of Responsible Party Site Remediation

AVM-HAZ WASTE FAC. BRANCH

CN 028

Trenton, NJ 08625-0028

Karl J. Delaney
Director**CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. P261028 830****CA93- AUG 31 1993**Mr. Stephen F. Lichtenstein
Lenox Inc.
Lawrenceville, N.J. 08648-2394

Dear Mr. Lichtenstein:

**Re: Lenox China - Pomona
Galloway Township, Atlantic County
NJPDES-DGW Draft Permit Modification Work Plan**

The New Jersey Department of Environmental Protection and Energy (Department), the United States Environmental Protection Agency (EPA) and the Pinelands Commission (PL) have reviewed the above referenced Work Plan and have determined that it is approved with the following modifications:

1. Lenox has proposed to monitor three (3) background wells (MW-1, 2 golf course wells) and four (4) downgradient wells (MW-75, MW-78, MW-13, and B-70) for the purpose of establishing background water quality for lead and zinc and statistically analyzing background versus downgradient concentrations. The proposed background wells are acceptable on the condition that Lenox submit the monitoring well specifications for the golf course wells. The proposed list of downgradient wells must be revised to also include MW-14S, MW-17, MW-25, MW-74 and B-52. Wells MW-13, and B-70 may be omitted from the original proposal. A map showing the location of all wells to be monitored must be submitted.
2. Lenox must also sample the recovery wells on a quarterly basis for lead and zinc. This data will be submitted to the Department along with the discharge monitoring reports (DMR) and will not be used as part of the statistical analysis.
3. The Department has concluded that Lenox may conduct a maximum of three (3) years of ground water monitoring to establish background quality. Lenox will still be required to statistically compare downgradient and upgradient concentrations after the first year as stated in the work plan.

If you have any questions, please contact me at (609) 633-1455.

Sincerely,



Frank Faranca, Project Manager
Bureau of Federal Case Management

Enclosure *w/o enclosure*
FFF *01/08/99 - KOM*

c: Andrew Park, USEPA, Region II
Daryl Clark, NJDEPE/DPFSR/BGWPA
Kathy Swigon, Pinelands Commission
John Kinkela, Lenox China, Pomona Facility